

**CALIFORNIA ENERGY COMMISSION**1516 NINTH STREET  
SACRAMENTO, CA 95814-5512

November 12, 2003

To: Interested Parties

Subject: Request for Proposals 500-03-503  
PIER Program, Combined Heat and Power Research, Development, and Demonstration Projects

Attached are the questions and answers pertaining to the above RFP. As stated in the RFP, the deadline to ask questions closed on October 21, 2003. All of the information needed by the Bidder is provided in the RFP and this package.

This package contains:

ATTACHMENT 1 - Questions and Answers  
ATTACHMENT 2 - Pre-Bid Conference Sign-In Sheets  
ATTACHMENT 3 – Commission's List of DVBEs

All of the terms and conditions of this RFP remain the same.

We look forward to receiving your proposal **no later** than **5:00 P.M. on December 12, 2003**. To ensure timely delivery, please be sure to label your proposal package(s) as follows:

Person's Name, Phone#  
Applicant's Name  
Street Address  
City, State, Zip Code  
Fax#RFP 500-03-503  
Contracts Office, MS-18  
California Energy Commission  
1516 - 9<sup>th</sup> St., 1<sup>st</sup> Floor  
Sacramento, CA 95814

Sincerely,

KATHY CHAN  
Contracts Officer

Attachments

## Questions and Answers

### Technical Eligibility

1. If a proposed project passes the Technical Eligibility Screening (Attachment 12, Section A), is it eligible for funding?

No. Just because a proposed project is technically eligible does not mean that it will score high enough under the evaluation criteria to be eligible for funding. Please review the evaluation criteria carefully before deciding whether or not to respond to this RFP.

2. In Attachment 12, does Technical Eligibility Screening criteria #4, “Explain how the proposed project (or results) will benefit electricity ratepayers of California’s investor owned utilities,” mean that the proposed work must benefit California’s investor owned utilities?

No. The proposed work must benefit the electricity ratepayers of California’s investor owned utilities.

3. Regarding Attachment 12, Technical Eligibility Screening criteria #4, “Explain how the proposed project (or results) will benefit electricity ratepayers of California’s investor owned utilities,” are there quantitative guidelines for providing this information?

No.

4. Would an industrial process known as qualified heat recovery qualify as a CHP project under this RFP?

This question appears to relate to comments submitted to the Energy Commission on the Implementation of the Renewable Portfolio Standard (RPS) Legislation in March 2003. Requirements under this RFP are independent of, and different from, those relating to the RPS. If the question can be stated as, “Does a proposed project that recovers waste heat from an industrial process to produce electricity qualify?” then the answer is yes, so long as the proposed project meets the other requirements of the RFP.

5. Would a system that produces shaft power for a mechanical drive in an industrial process, rather than to turn a generator, followed by waste heat recovery and beneficial use, qualify as a CHP project under the technical eligibility screening of this RFP?

Yes, so long as the Bidder shows that the shaft power produced will replace similar shaft power provided by an electric drive or that the shaft power would drive an electric generator.

6. Would a CHP system for residential applications be eligible for funding under this RFP?

Yes. Residential applications are eligible under this RFP.

7. Is there an opportunity under this RFP to propose a CHP system that includes a solar energy concentrator?

Yes. CHP systems involving renewable energy sources are eligible under this RFP.

8. What sources of energy (oil, natural gas, solar, etc.) will be allowed for proposed CHP systems?

A restriction has not been put on the input energy/fuel. However, the output must be power and the beneficial use of (other than only producing a second cycle of electricity) of waste heat.

9. Is there a minimum power output requirement for proposed projects?

No.

10. Is a proposed project for CHP basic research (as opposed to a field demonstration) technically eligible under this RFP?

Yes, as long as there is a connection between the research and increased use of CHP in the California marketplace.

11. If we are currently working on a CHP project for the U.S. Department of Energy (DOE), can we propose a project under this RFP that would be integrated with that work?

Yes, as long as what is proposed under this RFP would not otherwise be adequately provided by competitive and regulated markets. See Attachment 12, Section A – Technical Eligibility Screening, #3.

12. Would component development to improve NOx and CO emissions beyond today's BACT in a CHP system be technically eligible under this RFP assuming that commercialization results in expanded penetration of CHP technology in California?

It depends. If a proposed project is for emissions improvements that only meet proposed 2007 CARB emissions requirements by 2007, then the answer is no, because those emissions levels will have to be met anyway. If the proposed project is

for improvements that will be lower than the 2007 CARB emissions requirements or will achieve them prior to 2007, then the answer is yes. Note that improvements to prime movers are not eligible for funding unless the improvements relate to CHP. Also, projects should optimize overall fuel utilization efficiency.

13. The RFP requires Bidders to set forth certain benefits to electricity ratepayers of California's investor owned utilities. Is meeting the CARB 2007 emission standards considered a benefit when it has to be met anyway?

Because meeting CARB's 2007 emission levels is a proposed requirement, meeting them is not a "benefit" under this RFP. However, benefits can include meeting the standards prior to 2007 and/or achieving lower emission levels than required.

14. Would a project aimed at the light commercial market be technically eligible under this RFP?

Yes. CHP systems targeted at the light commercial market are eligible under this RFP.

**Proposal Evaluation**

15. Regarding Table 12-1 in Attachment 12,

A. Will the Commission provide assistance in finding or determining the baseline values of the parameters?

No. It is up to the Bidder to do it.

B. Are the values that you want for 2006, 2008, and 2014, based on the proposed project or other factors?

The values should normally be based on the proposed project. However, values based on other factors can be used if the proposed project is only for a portion of the technology development being contemplated (e.g., the technology will be developed in a 5 stage process, and the proposed project is for 1 of those stages). In such a case, the values for the other factors that are directly related to the full technology development should also be included and fully explained.

C. How will the values provided for the various parameters to be scored?

The values provided for the parameters will be scored based upon improvements from the baseline values, comparison to other proposed projects, comparison to commercially available systems (if any), and comparison to the goals of the PIER program.

D. How should environmental benefits be quantified? For example, if the end result is a product that produces BACT CO and NOx emissions without the use of SCR, by what method should the environmental benefits of reduced ammonia emissions into the atmosphere and the reduced transportation storage of ammonia throughout the state and at plant sites be qualified and quantified?

The question asks about environmental benefits, but be aware that Evaluation Criterion #5 in Attachment 12 involves more than just environmental benefits. A proposed project that does not provide significant energy benefits may not score high. It is up to the Bidder to determine how to best quantify benefits. One method of quantifying environmental benefits is to take the reduction per CHP system installed and multiply it by the likely number of installations over time. In the example provided, the Bidder could take the amount of ammonia saved per installed CHP system and multiply it by the number of expected installations in California over time. The benefits associated with reduced transportation and storage could just be stated and not quantified.

E. If the proposed project results in new technology that will be incorporated into a CHP system, should the values in the baseline column represent the CHP system before or after the new technology is incorporated?

It should be before the new technology is incorporated.

F. Will you provide an example of a properly filled in Table 12-1?

No. Please refer to the guidelines and instructions in Attachment 12.

G. If the proposed project will demonstrate new technology in a CHP system, and all of the improvements will be accomplished by 2006 (Targets) without the potential for further improvements, what values, if any, would be listed in the column for 2008 (Stretch Goals)?

The same values for 2006 because the values will not change by 2008.

16. Should we use the format for the Scope of Work (Attachment 8) to respond to Evaluation Criterion #4, "Technical Description of Proposed Work?"

No. There are two different descriptions of the project however, some information may be duplicative.

17. Will shorter term projects score better than longer term projects?

Not necessarily. Even though we are interested in nearer-term results, we are more interested in the project's benefits than the timeframe.

18. Will a proposal score higher if it includes a field demonstration versus just conducting testing in a laboratory, all other factors being equal?

For evaluation criteria that take this fact into account, field demonstration projects would likely receive higher points than lab test projects. There is no guarantee that a field demonstration project would be funded before a lab project. It will depend on each project's final ranking.

19. If a proposal is for a solar related project, is the Bidder expected to come up with a dollar value for the savings of natural gas for the evaluation criteria?

Not necessarily a dollar value, but provide the quantity of natural gas saved. It is up to each Bidder to explain the benefits of the proposed project, and in general, the more specificity the better.

20. The RFP requires Bidders to set forth certain benefits to electricity ratepayers of California's investor owned utilities. Does paying royalties count as one of these benefits?

No, because unless there is an exception, royalties are required of all Bidders.

21. Regarding Attachment 12, Section B.3.B.2., Quantity and Timing of California Market Penetration,

A. Should the quantities and timeframes of California market penetration represent the Contractor's or OEM's actual sales estimates or projections of CHP systems that incorporate the project related product or should they represent the potential sales achievable?

Sales estimates or projections could be used to describe the quantity and timing of California market penetration. However, the potential sales achievable would be more appropriate for the first item, which is the Total California Market.

B. Should the market penetration quantities and timeframes represent the Contractor's own estimates as to when the project related product (PRP) will become commercially available and how many PRP's can potentially be sold, or should they represent the potential if the PRP was adopted and sold by others; i.e., the projected efforts of a single Contractor or the potential efforts of the entire industry?

Some Bidders will already know whether they plan to sell the product or have it sold by, or licensed to, others, and these Bidders should use the numbers from whichever one they are pursuing. If a Bidder doesn't know, then projections of both would be useful as well as an explanation of when and how the decision will be made between the two.

22. Is there a priority among the PIER Goals listed?

No. Bidders should provide the information requested based upon the PIER goals that their projects help achieve.

**Match Funds**

23. Are matching funds beneficial from an evaluation standpoint if there is a 100% public benefit in the proposed project?

Yes. Benefits and PIER funds and match funds are separate evaluation criteria that are scored independently. A claim of a high or 100% public benefit should be well substantiated.

24. Does a Bidder have to equate public benefit to a monetary value?

It is up to each Bidder to describe and quantify, to the extent possible, the public benefits versus the private benefits. Bidders should explain the nature of public and private benefits expected from their projects and should explain how the benefits were valued. Scorers will evaluate the reasonableness of the information provided.

25. Do you have an example from a previous RFP that had a good response to the question of public versus private benefits relative to match and private funding?

No. The benefits vary too much per project to provide a general, good example that could be useful or followed.

26. What are the matching fund requirements if a Project Related Product results in 50% public benefit in one area, such as improved CHP efficiency, and 100% public benefit in another area?

The amount of match funds should reflect the ratio of private benefits to public benefits for the ENTIRE project and all of the benefits areas considered.

27. When should match funds be spent?

We expect match funds to be spent concurrent with PIER funds and not at the end of the project. Match funds may be spent before PIER funds. See Section I. Introduction, #11. What are the Match Funding Requirements?

28. Can donated labor hours be used as match funds?

Yes, if they can be quantified and documented.

29. Is there a minimum match fund requirement under this RFP?

No. See Attachment 12, Section B – Evaluation Criteria, #8. Project PIER Funds and Match Funds.

30. If a Bidder develops a CHP system that will be sold in California, but not outside of California, does that mean that there is no private benefit to the Bidder?

No. Selling a CHP system anywhere - be it in California or outside of California - will generate revenue and profit for the company selling it. The revenue and profit generated are considered for the most part private benefits. We recognize that the company is located in California, increased sales means an increase in jobs in California and more sales tax for the state.

31. If the Bidder can show that the proposed CHP system is replicable at many sites in California and is likely to have a certain market penetration, can the improvements of the system over what is currently available be aggregated and be used to help estimate the public benefits of the project for calculation of the ratio of match funds that would be expected for the project?

Yes.

32. Does a sale of CHP system to a public entity reflect a public benefit?

No. The sale is considered a private benefit to the company because it generates revenue and profit for the company.

33. What sources of funds cannot be counted as match funds?

Match funds cannot not be spent prior to, or after, the proposed project awarded from this RFP. See Section I, Introduction, #11. What are the Match Funding Requirements?

34. What do private benefits and public benefits refer to?

The definitions for “Public benefit” and “Private benefit” are in Section IV, Administrative Information, #41. Key Words and Their Definitions.

35. If a proposal involves standard equipment integrated in a novel way, can the entire cost of the equipment be counted as matching funds or only the portion on which the integration is conducted?

Only the portion of the equipment dedicated to this project is considered match funding. See Section I, Introduction, #11, What are the Match Funding Requirements?



36. Can awards from the U.S. Department of Energy (DOE) be used as match funding?

Yes, so long as the proposed project under this RFP is a new and different project than the one for DOE. Funds already received from DOE and spent cannot count as match funds. See Section I, Introduction, #11, What are the Match Funding Requirements?

**Scope of Work**

37. Should we have subtasks to the technical tasks in the Scope of Work (Attachment 8)?

No. The work to be performed should be divided into tasks, and the tasks should not be further subdivided.

**Budget**

38. What is a Key Subcontractor?

The definition for a “Key Subcontractor” is in Section IV. Administrative Information, #41. Key Words and Their Definitions.

39. For Key Subcontractors, do Bidders have to break out their labor rates on the budget forms, or can a fully loaded rate be used?

For Key Subcontractors, the labor rates have to be broken out on the budget forms; a fully loaded rate cannot be used (however, see the next question).

40. If we buy equipment and the purchase amount is such that the vendor of that equipment is a Key Subcontractor, do we have to provide the labor rates for that equipment vendor?

The Bidder is required to submit contract budgets for each subcontractor when the amount awarded to the subcontractor exceeds \$100,000 or is 25% of the Bidder’s budget, whichever is less.

A Bidder must provide subcontractor personnel rates when the subcontractor is required to use staff time on activities such as designing technical apparatuses, testing equipment, decommissioning and/or administrative related functions. On the other hand, if the subcontractor is simply providing a technical gadget such as a “black box” to the Bidder, without extensive testing, design etc., and the cost is within the standard commercial rates and/or practices, then the Bidder may not be required to submit personnel rates for the subcontractor to the Commission.

For example, if the subcontractor is providing a basic residential air conditioner (or black box), that requires only installation and very minor “one-time” adjustments, then it may not be necessary for the Bidder to provide the personnel rates for the

subcontractor's staff installing the air conditioner. However, if the air conditioner has new efficiency standards and the subcontractor's staff is to do the re-designing, modifying, and/or testing; then the personnel rates for the subcontractor's staff must be provided as part of the Budget (see Exhibit C, Table 3).

*41. Does the restriction that only up to 10% can be claimed as profit mean 10% of the PIER budget or the entire project budget (PIER plus match)?*

Only up to 10% of the PIER budget can be claimed as profit. Because the Prime PIER budget is divided into Tasks, no more than 10% of the amount for each task can be listed in the Profit column for that task. For example, if Task 1 is budgeted for \$100 of PIER funds and Task 2 is budgeted for \$200 of PIER funds, no more than \$10 and \$20 can be listed in the profit column respectively for these tasks. It would NOT be acceptable to list \$15 and \$15 for each task, because even though this amounts to 10% of the total budget for both tasks, \$15 is more than 10% of the PIER funds allocated to Task 1.

*42. Regarding the Personnel Hourly Rates and Benefits budget forms in Attachment 9, the rates show what might be billed during the given timeframe. Is the rate range multiplied by the hours to calculate the direct labor, and if so, should the higher or lower value of the range be used?*

Yes, but only to the extent that the rates were provided in your proposal. In Attachment 9, the budget forms are provided in Excel format on the Commission Web Site for the RFP, instructions for completing the forms precede the forms. Prepare a separate list of rates for each year of the contract that extends out to 2008. Use current rates for the current year and project rates for future years. If your rates and accounting processes/systems have been audited and accepted by an auditing agency, please provide a copy of the acceptance including the rates accepted by the auditing agency.

*43. Regarding the Direct Labor Hours by Task budget forms in Attachment 9, do we list the hours by year?*

No. The total hours per task for the entire project term should be listed.

*44. Regarding the Pre-approved Travel, Equipment List, Materials List, and Miscellaneous Expenditures budget form in Attachment 9, the instructions for that form indicate that trips not identified on this form will need prior written approval by the Commission Contract Manager. Does this same restriction apply to match funding?*

No. Prior approval is not needed to take trips using match funds. However, the match funds used must be budgeted in the Travel column on the match fund budget form. Any match funds must be related to the project and subject to an audit.

## **DVBE**

### **45. Where can I find a list of DVBEs?**

It is a California program so the companies must be California DVBEs and certified by the California Department of General Services (DGS). The DGS Web Site is: [www.pd.dgs.ca.gov/smbus](http://www.pd.dgs.ca.gov/smbus).

### **46. If a DVBE quoted a higher cost than a non-DVBE, is it acceptable to not select the DVBE?**

Yes.

### **47. If we install equipment by our own forces, what are the impacts on the DVBE requirements since the only other cost is equipment purchase?**

The DVBE program is mandated by California State Law. The Commission administers its DVBE program in accordance with that law. The law requires DVBE compliance at the time a proposal is submitted to be considered a responsive Bidder, if the proposal does not meet DVBE compliance, it is considered nonresponsive and must be rejected.

## **Small Business**

### **48. Is there any credit given for the subcontractors being Small Business certified?**

No.

### **49. What are the ways to qualify as a small business under this RFP?**

There are two ways to qualify: certification by the State of California or self-certification under the federal guidelines.

## **Royalties**

### **50. If our project is to package or group together components that already exist into a system, how is the royalty repayment provision applied?**

The royalty repayment provision only applies to work conducted under the PIER contract and does not attach to research prior to the PIER contract. If the PIER contract work result in a new “package of components” and that “new package” generates revenues, repayment is triggered.

### **51. If the research is for a component that will be used in a CHP system, is the repayment based upon the component or the system that it is put into?**

The component, assuming that the system is not otherwise changed as part of the PIER contract. The royalty repayment provision only applies to work conducted under the PIER contract. However, the amount of repayment may be based on the component's value added or contribution to the overall system price.

52. Does the repayment requirement apply to subcontractors?

Our contract is with the prime contractor and not the subcontractors. Subcontractors are not responsible directly to the state for the royalty repayment provision. However, we anticipate that our prime contractors will take appropriate business steps to recoup economic benefits if there is any to be generated, which in turn are then subject to royalty repayment.

53. Because subcontractors are not responsible for repayment to the Commission, does there have to be a financial connection between the prime contractor and the subcontractor(s) such that the prime contractor will receive some economic benefit, which in turn would assure repayment?

There is not a requirement to flow down repayment terms from prime contractors to subcontractors. However, we anticipate that our prime contractors will take appropriate business steps to recoup economic benefits, which in turn are subject to royalty repayment.

**Intellectual Property**

54. It is understood that the State retains a license "to use or have practiced for or on behalf of the State of California the subject invention(s) for governmental purposes." What constitutes the limitations of "for or on behalf of the State of California?"

There are no stated limitations. The result depends on the facts of each individual situation.

55. Clauses for Technical, Generated and Deliverable Data and for Copyrights contains language granting license to the State to use in all manners the information and "to authorize others to produce, translate, publish, use and dispose of all copyrightable material" and "to authorize others to produce, translate, publish and use the data" without the limitation to use or have practiced for or on behalf of the State of California. How can we protect our intellectual property with the license granted that State?

License to the State is only given to Data and Copyrights on material produced under the terms of the Agreement. If the parties anticipate that Data or Copyrightable material will be developed during the Agreement that must be either, protected in order to maintain a trade secret, or is information that is protected under federal/state law, such must be identified in the contract deliverables as confidential. Confidential deliverables will not be made public until the period of protection has lapsed. In

these circumstances, the Commission wants both a public deliverable and a confidential deliverable. The public deliverable can be used in any manner consistent with the State's license. See Attachment 7, Agreement Terms and Conditions Pier Project, Clause #17 and #18.

### **Miscellaneous**

56. Are we ineligible to bid because we don't have 4 references?

Yes. If the Bidder is a relatively new entity, they may wish to use references for the individual Key Personnel as opposed to the entity.

57. Can an organization submit more than one proposal?

Yes. However, each proposal must be for a distinct project.

58. Is there a specific project timeframe?

PIER funding for the projects is available through March 31, 2008. Beyond this deadline, there is no set, required project timeframe. In general, the project timeframe should reasonably reflect the work to be performed.

59. Can a Bidder include an alternate project in a proposal and let the Commission decide whether to fund one or both?

No.

60. Is there a restriction that would preclude using subcontractors from other countries?

No.

61. Are the proposals submitted in response to this RFP available to the public?

Yes. After the proposals have been evaluated and a Notice of Proposed Awards has been posted, the proposals become public record.

62. Is it possible that the funds for this program which will fund the selected projects will be withdrawn?

It is possible, but not likely at this time.

63. Are demonstration projects for Distributed Generation projects funded through the California Energy Commission's PIER program subject to the California Public Utilities Commission's surcharge of 2.7 cents/kw-hr (for leaving the grid)?

Determination of whether a project is subject to the surcharge is made by the California Public Utilities Commission. Please contact them.

# CALIFORNIA ENERGY COMMISSION PRE-BID CONFERENCE

**RFP# 500-03-503**

**DATE: October 21, 2003**

**VOLUNTARY SIGN-IN:** You are not required to sign this sheet or provide any information as a condition for attending or participating in this meeting. However, if you want to receive notices of future meetings on today's topics, or be identified as a small or disabled veteran business enterprise, please provide the requested information in the spaces below. A copy of this list will be mailed with the questions and answers to all those who requested a copy of this RFP.

**\*\*Please use black or blue ink only and Print Legibly\*\***

NAME AND COMPANY	ADDRESS AND PHONE NUMBER	SMALL OR DISABLED VETERAN BUSINESS ENTERPRISE
Red Hite EEA	22358 Claibourne Salinas, CA 91550 <a href="mailto:rhite@sbcglobal.net">rhite@sbcglobal.net</a>	
Patt Petrovich Solar Turbines	9330 Sky Park Court San Diego, CA 92123-5398 (858) 694-6797 <a href="mailto:petrovich_patt_a@solarturbines.com">petrovich_patt_a@solarturbines.com</a>	
Jay Kohler York International	P.O. Box 1592 - 361 P York, PA 17405 (717) 771-7127 <a href="mailto:jay.kohler@york.com">jay.kohler@york.com</a>	
Carl Hiller Applied Energy Technology	35 College Park Davis, CA 95616 (530) 758-3035 <a href="mailto:chiller@davis.com">chiller@davis.com</a>	Small Business
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Don Erickson ECC	627 Ridgely Avenue Annapolis, MD 21401 (410) 266-6521 <a href="mailto:enerconcept@aol.com">enerconcept@aol.com</a>	Small Business
Tod O' Connor GTI	5427 Fenwood Avenue Woodland Hills, CA 91367 (818) 883-1038 <a href="mailto:todoc@aol.com">todoc@aol.com</a>	
Eric Worrell EEW Co.	P.O. Box 271923 Concord, CA 94527	
Howard Mason TIAX	1601 De Anza Blvd. Cupertino, CA 95014 <a href="mailto:Mason.howard@tiax.biz">Mason.howard@tiax.biz</a>	
David Littlejohn Lawrence Berkeley Lab	1 Cyclotron Road Berkeley, CA 94720 <a href="mailto:dlittlejohn@lbl.gov">dlittlejohn@lbl.gov</a>	
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Nyck Irvin IPT	1042 W. Hedding St. #100 San Jose, CA 95126	
Marvin Feldman, Ph.D. Resource Decisions/ITRON	934 Diamond Street San Francisco, CA 94114 (415) 282-5330	Small Business
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Richard Judd Judd Associates	Box 521 El Dorado, CA 95623	DVBE
Curt Chesler DTE Energy Technologies	333 Sunset Avenue, Suite 220 Suisun City, CA 94505	
Michael Theroux Theroux Environmental	P. O. Box 7838 Auburn, CA 95604-7838	



### ATTACHMENT 3

The list below contains names of DVBE's whom the Commission has worked with in the past, or have contacted me and asked to be identified and advocated for on RFP Projects. They are all in the energy-related field.

SANDRA BARNETT, DVBE ADVOCATE, CALIFORNIA ENERGY COMMISSION

#### CARTS, LLC

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San Diego, CA 92110

Phone: 619/449-3656

Fax: 619/449-3543

Email: [hines@cars.com](mailto:hines@cars.com)

Engineering

Ref. #20454

#### Micropower Energy, Inc.

P.O. Box 157

Alameda, CA 94501

Phone: 510/551-5182

Fax: 707/897-8343

Email: [rod.nash@micropowerenergy.com](mailto:rod.nash@micropowerenergy.com)

Ref. #28520

#### Robert Penny Enterprises

Phone: 916/383-5085

Fax: 916/282-4058

Email: [nancy-woods@mindspring.com](mailto:nancy-woods@mindspring.com)

Ref. #498

Field Survey Specialists

#### ASN EnviroServ

1670 Kronen Way

Solvang, CA 93463

Phone: 805/686-5651

Fax: 805/686-5651

Email: [anelson@asnenviroserv.com](mailto:anelson@asnenviroserv.com)

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#### DVBE Tech Inc.

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Ref. #21556

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